

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

VERMIN LOVE SUPREME,
an individual;

Plaintiff,

v.

THE CITY OF CONCORD; et al.,

Defendants.

Civil Case No. _____

**DECLARATION OF
KEITH YERGEAU**

I, Keith Yergeau, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. I am a political organizer and a long-time supporter of Vermin Supreme.

3. I am familiar with Vermin Supreme's long-standing political platform, which has long advocated for "free ponies for every American," which I consider political humor and parody.

4. I recently found out that Hillary Clinton will be signing copies of her book, "What Happened, on December 5, 2017 at Gibson's Bookstore in Concord, New Hampshire, which is located at 45 South Main Street, Concord, NH.

5. I know that Clinton makes a reference in her book where she talks about something she saw on Facebook that made the comparison that Bernie Sanders promises were like promising "free ponies to every American."

6. Given that Vermin Supreme's platform has advocated this exact policy for many years and more than one presidential campaign cycle, I had no doubt that this portion of the book was a reference to Vermin Supreme and his political platform.

7. Mr. Supreme told me that he procured one or two live ponies in order to make a statement about Clinton's reference in her book to his platform.

8. Mr. Supreme told me that he wanted to bring the ponies to a protest outside of the book signing, not inside the store.

9. Mr. Supreme wished to do so legally, and he asked me to obtain a permit so that he could bring either both of the ponies or one of the ponies to the protest.

10. Mr. Supreme asked me to arrange getting the permit.

11. On November 20, 2017, I called the Concord Police Department (“CPD”) at Mr. Supreme’s direction and spoke to an employee, whom I assumed was an Officer, over the phone, but I do not remember the Officer’s name.

12. I asked the Officer about obtaining a permit for the ponies, and the Officer told me that I would need to call the Concord Code Administration (“CAD”) to obtain a permit for the ponies.

13. I complied with the Officer’s request and at his direction contacted the CAD to inquire about obtaining the needed permit for the ponies immediately afterwards.

14. I called CAD and left a message on the general answering machine for CAD.

15. On November 21, Eugene Blake (“Mr. Blake”) of either CAD or the CHLSD called me back.

16. I told Mr. Blake that the CPD told me to call CAD because I needed to obtain a permit to have two ponies outside near 45 South Main Street, Concord, NH.

17. Mr. Blake said he would call me back later that day.

18. Mr. Blake called me back and told me that there were no general restrictions on having ponies outdoors at that location, and that ordinarily he would grant the permit to have the pony at that location.

19. However, Mr. Blake said that the CPD directed him not to grant a permit for the ponies on that day, and at that location, specifically because no one wanted to interfere with Mrs. Clinton’s book signing.

20. Mr. Blake mentioned that the CPD mentioned something about coordinating with the Secret Service, since given Mrs. Clinton's status as the former First Lady she would be accompanied by them.

21. Mr. Blake said that he could issue a permit to have the live ponies at that location on another date or time, but noted specifically that he would not issue a permit to bring the live ponies near 45 South Main Street, Concord, NH because of Clinton's book signing.

22. I attempted to negotiate with Mr. Blake, and asked him if there was any possibility or circumstance that could convince him to grant the permit for the ponies on the same date near 45 South Main Street, Concord, NH.

23. Mr. Blake refused, and said that he would not issue the permit on the date and location outside the bookstore under any circumstances.

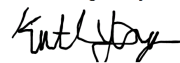
24. Mr. Blake specifically told me that the police would not allow us to have the ponies at the protest, which I perceived as a warning that we would get in trouble if Mr. Supreme arrived with the ponies without the needed permit.

25. Given that Clinton will likely only have a book signing of What Happened in the City of Concord once, this is truly a once-in-a-lifetime opportunity.

26. Since the ponies are symbols of Mr. Supreme's political speech, I believe the message will be lost if Mr. Supreme cannot obtain a permit to bring the ponies to the scheduled protest outside of the book signing on December 5, 2017.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 1, 2017.

DocuSigned by:

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Keith Yergeau